

1 RENE L. VALLADARES  
Federal Public Defender  
2 Nevada State Bar No. 11479  
MARGARET W. LAMBROSE  
3 Assistant Federal Public Defender  
Nevada State Bar No. 11626  
4 411 E. Bonneville, Ste. 250  
Las Vegas, Nevada 89101  
5 (702) 388-6577/Phone  
(702) 388-6261/Fax  
6 Maggie\_Lambrose@fd.org  
7 Attorney for Fredy Hernandez-Gomez

8  
9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,  
12 Plaintiff,  
13 v.  
14 FREDY HERNANDEZ-GOMEZ,  
15 Defendant.

Case No. 2:18-mj-328-GWF

**STIPULATION TO CONTINUE  
PRELIMINARY HEARING**  
(Second Request)

16  
17 IT IS HEREBY STIPULATED AND AGREED, by and between Dayle Elieson, United  
18 States Attorney, and Christopher Burton, Assistant United States Attorney, counsel for the  
19 United States of America, and Rene L. Valladares, Federal Public Defender, and Margaret W.  
20 Lambrose, Assistant Federal Public Defender, counsel for Fredy Hernandez-Gomez, that the  
21 Preliminary Hearing currently scheduled on May 4, 2018 at 4:00 p.m., be vacated and continued  
22 to a date and time convenient to the Court, but no sooner than thirty (30) days.

23 This Stipulation is entered into for the following reasons:

24 1. Counsel for the defendant needs additional time to review discovery and conduct  
25 investigation in this case to determine whether there are any issues that must be litigated prior  
26

1 to the scheduled preliminary hearing and determine whether the case will ultimately go to  
2 preliminary hearing or will be resolved through negotiations.

3 2. Defendant is incarcerated and does not object to a continuance.

4 3. Additionally, denial of this request for continuance could result in a miscarriage  
5 of justice.

6 This is the second request for continuance filed herein.

7 DATED this 24<sup>th</sup> day of April, 2018.

8  
9 RENE L. VALLADARES  
Federal Public Defender

DAYLE ELIESON  
Acting United States Attorney

10  
11 */s/ Margaret W. Lambrose*  
By \_\_\_\_\_

*/s/ Christopher Burton*  
By \_\_\_\_\_

12 MARGARET W. LAMBROSE  
13 Assistant Federal Public Defender

CHRISTOPHER BURTON  
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 FREDY HERNANDEZ-GOMEZ,

7 Defendant.

Case No. 2:18-mj-328-GWF

**ORDER**

9  
10 Based on the Stipulation of counsel and good cause appearing,

11 IT IS THEREFORE ORDERED that the Preliminary Hearing currently scheduled on  
12 May 4, 2018 at the hour of 4:00 p.m., be vacated and continued to June 5, 2018 at the  
13 hour of 4:00 p m.

14 DATED this 25th day of April, 2018.

15  
16   
17 UNITED STATES MAGISTRATE JUDGE